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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Lance Downes-Covington, an individual,

Plaintiff,

vs.

City of Las Vegas, a political subdivision of
the state of Nevada; Sergio Guzman, in their
individual capacity; Sarkis Jopalian, in their
individual capacity; Paul Hartz, in their
individual capacity; Janelle Mazza, in their
individual capacity; and Doe Las Vegas City
Marshals 1-10, in their individual capacity,

Defendants.

CASE NO. 2:25-cv-0737-JAD-BNW

**STIPULATION AND PROPOSED ORDER TO CONTINUE
DEADLINE TO SUBMIT DISCOVERY PLAN AND SCHEDULING ORDER**

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Plaintiff Lance Downes-Covington, and Defendants City of Las Vegas, Sergio Guzman, Sarkis Jopalian, Paul Hartz and Janelle Mazza, through their respective counsel, stipulate to extend the deadline for the parties to submit a proposed Discovery Plan and Scheduling Order for a period of thirty (30) days.

This is the first request for an extension of any discovery-related deadline. The requested extension is in good faith and not for purposes of undue delay. The request is submitted at least twenty-one (21) days or more before the expiration of the current deadline of July 28, 2025.

1 The parties have agreed to enter into resolution discussions at this time. In order to focus
 2 the parties' time and resources into potential resolution, the parties wish to briefly continue the
 3 deadline to submit their proposed Discovery Plan and Scheduling Order, and related deadline to
 4 complete a Rule 26(f) conference. The parties propose the following continuation of dates.

5 **1. Deadline to conduct Rule 26(f) Conference.**

6 The parties' current deadline to complete their Rule 26(f) conference is July 14, 2025.
 7 The parties request that the Court extend that deadline to **August 13, 2025**.

8 **2. Deadline to submit proposed Discovery Plan and Scheduling Order.**

9 The parties' current deadline to submit a proposed Discovery Plan and Scheduling Order
 10 is July 28, 2025. The parties request that the Court extend that deadline to **August 28, 2025**.

11 By way of this extension request, the parties request that the future triggering date for
 12 purposes of setting discovery deadlines also be continued by thirty (30) days. Specifically,
 13 Defendants' appearance date of June 12, 2025, will be applied as Monday, July 14, 2025, for
 14 purposes of calculating future deadlines based on the Defendants' first appearance.

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1 The parties make this stipulation in good faith and not for the purposes of undue burden
2 or delay.

3 IT IS SO STIPULATED.

4 DATED this 25th day of June, 2025.

DATED this 25th day of June, 2025.

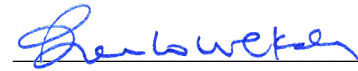
5 ACLU OF SOUTHERN NEVADA

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14 IT IS SO ORDERED.

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17 6/26/2025

18 DATE